

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

A.G., a minor child; D.A., a minor child;)
A.L., a minor child; M.K., a minor child;)
and M.H., a minor child;)

PLAINTIFFS,)

VS.)

AUTAUGA COUNTY BOARD OF)
EDUCATION, et al.,)

DEFENDANTS.)

CASE NO: 2:05-CV-1090-MEF

B.H., a minor child, by and through his)
mother and next of friend, D.S.,)

PLAINTIFFS,)

VS.)

AUTAUGA COUNTY BOARD OF)
EDUCATION, et al.,)

DEFENDANTS.)

CASE NO: 2:06-cv-0393-MEF

AUTAUGA COUNTY BOARD OF EDUCATION, JOSEPH L. BUTLER AND DENE
CLEVELAND'S OBJECTIONS TO PLAINTIFFS' SEVENTH REQUEST FOR
PRODUCTION

COME NOW Defendants Autauga County Board of Education, Joseph L. Butler and Dene Cleveland and object to plaintiffs' seventh request for production:

1. Defendants object on the grounds of *In Re: Ford Motor Co.*, F.3d 1315 (11th Cir. 2003). Defendants object to production request # 1 as it is unduly burdensome, harassment, in violation of the defendants' privacy rights, in violation of the privacy rights



of the students and employees of the Autauga County Board of Education, a violation of FERPA, seeks confidential information, irrelevant and not designed to lead to the discovery of relevant evidence. If the plaintiffs will refine their request to certain matters relevant to these cases, the defendants can respond.

2. Defendants object on the grounds of *In Re: Ford Motor Co.*, F.3d 1315 (11th Cir. 2003). Defendants object to production request # 2 as it is unduly burdensome, harassment, in violation of the defendants' privacy rights, in violation of the privacy rights of the students and employees of the Autauga County Board of Education, a violation of FERPA, seeks confidential information, irrelevant and not designed to lead to the discovery of relevant evidence. If the plaintiffs will refine their request to certain matters relevant to these cases, the defendants can respond.

3. Defendants object on the grounds of *In Re: Ford Motor Co.*, F.3d 1315 (11th Cir. 2003). Defendants object to production request # 3 as it is unduly burdensome, harassment, in violation of the defendants' privacy rights, in violation of the privacy rights of the students and employees of the Autauga County Board of Education, a violation of FERPA, seeks confidential information, irrelevant and not designed to lead to the discovery of relevant evidence. If the plaintiffs will refine their request to certain matters relevant to these cases, the defendants can respond.

4. Defendants object on the grounds of *In Re: Ford Motor Co.*, F.3d 1315 (11th Cir. 2003). Defendants object to production request # 4 as it is unduly burdensome, harassment, in violation of the defendants' privacy rights, in violation of the privacy rights

of the students and employees of the Autauga County Board of Education, a violation of FERPA, seeks confidential information, irrelevant and not designed to lead to the discovery of relevant evidence. If the plaintiffs will refine their request to certain matters relevant to these cases, the defendants can respond.



Mark S. Boardman (ASB-8572-B63M)
Katherine C. Hortberg (ASB-5374-B34K)
BOARDMAN, CARR & HUTCHESON, P.C.
400 Boardman Drive
Chelsea, Alabama 35043-8211
(205) 678-8000

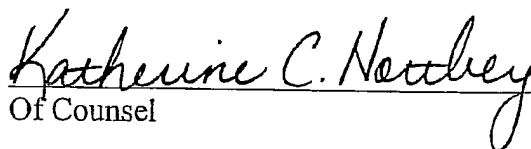
CERTIFICATE OF SERVICE

I hereby certify that I have on this 8th day of **November, 2006**, served a copy of the foregoing on counsel via facsimile and United States Mail properly addressed and first class postage prepaid, to wit:

Michael J. Crow, Esq.
BEASLEY, ALLEN, CROW, METHVIN,
PORTIS & MILES, P.C.
P. O. Box 4160
Montgomery, Alabama 36103-4160

Robert D. Drummond, Jr., Esq.
323 De La Mare Avenue
Fairhope, Alabama 36532

Mr. Terry C. Wright, AIS 247561
Limestone Correctional Facility, Dorm 16
28779 Nick Davis Road
Harvest, AL 35749-7009


Of Counsel